

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

JOSE HERNANDEZ, INDIVIDUALLY, *
AND AS NEXT FRIEND OF AN *
INCAPACITATED ADULT, IRMA *
HERNANDEZ, AND AS NEXT FRIEND*
OF ANIBEL HERNANDEZ, A MINOR, *
AND ANNA HERNANDEZ, A MINOR,*
AND ANA HERNANDEZ *

Plaintiffs

VS.

FORD MOTOR COMPANY,
Defendant

CIVIL ACTION NO.

C-04-319

(JURY DEMANDED)

NOTICE OF SETTLEMENT

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE:

COMES NOW, JOSE HERNANDEZ, INDIVIDUALLY, AND AS NEXT FRIEND OF AN INCAPACITATED ADULT, IRMA HERNANDEZ, AND AS NEXT FRIEND OF ANIBEL HERNANDEZ, A MINOR, AND ANNA HERNANDEZ, A MINOR, AND ANA HERNANDEZ, Plaintiffs herein and Defendant Ford Motor Company, Defendant herein, and file this their Joint Notice of Settlement and respectfully offer the following:

1. On or about June 7, 2006, the parties successfully reached a settlement agreement subject to the Court's approval.
2. The parties respectfully file this notice to advise the Court of the tentative settlement, as there are motions pending before the Court, which may be rendered moot if the Court approves a settlement in this case.
3. Court approval will be necessary due to claims that have been asserted on behalf of an incapacitated person as well as a minor child.

4. All claims asserted by Plaintiffs against Defendant Ford Motor Company related to the subject accident have been settled, including all such claims asserted in Plaintiffs' current pleading.

5. Plaintiffs are filing simultaneously with this notice an Agreed Motion for an appointment of ad-litem.

Respectfully submitted,

SICO, WHITE & BRAUGH, L.L.P.

Brantley White
900 Frost Bank Plaza
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Corpus Christi, Texas 78470
Phone: 361-653-3300
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By: s/Brantley W. White
Brantley White
State Bar No. 00789722
Federal Id. No. 22400
ATTORNEY IN CHARGE
FOR THE PLAINTIFF

AGREED:

s/John W. Chambliss
Mr. John W. Chambliss
State Bar No. 00796334
THOMPSON, COE, COUSINS & IRONS
701 Brazos
1500 Austin Centre
Austin, Texas 78701
ATTORNEY FOR DEFENDANT
FORD MOTOR COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was forwarded to all counsel of record by electronic method of service on this the 16TH day of June, 2006.

s/Brantley W. White
Brantley W. White

John W. Chambless
THOMPSON COE
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Austin, TX 78701